

Comments RE: WT Docket 05-235

In reviewing comments on the matter of eliminating the current 5 WPM Morse examination from Amateur Radio testing, most replies have indicated either it to be a “burden” or the mode is antique. If the bandwidth of a CW signal is compared to a SSB signal one would find the CW signal due to its narrow bandwidth has approximately 17 dB of inherent built-in system gain. Amateur Radio does not have the luxury of increasing power above 1500-Watts maximum under current Part 97 Rules. HF “circuits” during sunspot-cycle minimums and simple thunderstorm activity requires HF power to be increased well above 1500 Watts to maintain a reliable throughput of information. It is for that reason that CW with its inherent system gain gets through when SSB does not.

With Amateur Radio being utilized as a backup emergency communications medium, it is felt that Part 97 should retain Morse testing as a licensing requirement. The compromise of deleting the requirement would over time see Morse phased out of the arsenal of communication modes available to hams for emergency communications when HF circuits become extremely noisy. No other service under CFR 47 allows for that flexibility in communications.

It is also realized that additional new technologists join the ranks of Amateur Radio bringing with them new digital technology ideas. For this reason the Morse testing might be dropped from the entry levels of ham radio on both VHF and HF. Morse testing should, however, still be required of Amateur Extra applicants. The Amateur Extra level is after all just that, a license that shows expertise in the area of Amateur Radio in areas of theory and practical application.

It is totally unwise to remove or phase out CW under Part 97 when in fact this is the “trump card” in the hams’ arsenal of methods for communications when HF conditions are extremely noisy or propagation is marginal due to external circumstances.

The Commission said it believes dropping the 5 WPM Morse examination would encourage more people to become Amateur Radio operators and would eliminate a requirement that’s “now unnecessary” and may discourage current licensees from advancing their skills. If one examines any other FCC Part under CFR 47, including public safety users to the everyday citizen using a cell phone, these people do not have to take any type of examination to use their 2-way wireless devices. The same can be said for Radio Amateurs going forward as equipment designs become more and more of a push-to-talk device. So one could really equate knowing advanced theory or Morse does not necessarily make you a better radio operator. Radio Amateurs, however, have prided themselves in knowing radio from its theory of operation, operating skills and electronic theory. Even though Article 25 of the International Radio Regulations

adopted at the WRC 2003 supported dropping the code requirement, that one of the best tools and skills would be removed from a service that provides emergency and reliable operations under conditions that are next to impossible.

It is therefore request the Commission rethink its position on changing Part 97 to reflect the deletion of the Morse testing requirment.